



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

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OFFICE OF
ENFORCEMENT AND
COMPLIANCE ASSURANCE

Lori P. Miller
Senior Staff Officer
National Center for Animal Health Emergency Management
Veterinary Services
Animal and Plant Health Inspection Service
U.S. Department of Agriculture
4700 River Road, Unit 41
Riverdale, MD 20737-1238

Subject: EPA comments on the draft Programmatic Environmental Impact Statement (PEIS) for Carcass Management During a Mass Animal Health Emergency (CEQ # 20150232)

Dear Ms. Miller:

In accordance with our authorities under the National Environmental Policy Act (NEPA), Council on Environmental Quality regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act, EPA has reviewed the above referenced document developed by the U.S. Department of Agriculture (USDA), Animal and Plant Health Inspection Service (APHIS) on *Carcass Management During a Mass Animal Health Emergency*.

The draft PEIS proposes a nationwide plan for managing carcasses in the event of a mass animal health emergency, defined in the PEIS as a natural disaster or a biological, chemical, and/or radiological event generating 50 tons of carcasses or more.

The draft PEIS analyzes three carcass management alternatives that could be implemented during a mass animal health emergency and used to support mass animal health emergency planning and decision-making. APHIS identified Alternative 3 (*Adaptive Management*) as the preferred alternative in the PEIS. Alternative 3 would allow all available carcass management options to be considered as well as provide flexibility in using the best available resources.

EPA has questions about two disposal options (unlined burial pits and open air burning) that are in all three alternatives, including the no action alternative, as the draft PEIS states that these two options have the highest impacts and risks to human health and the environment.

Based on our review we have rated the carcass management plan and document as *Environmental Concerns - Insufficient Information (EC-2)* (see the enclosed "Summary of EPA Rating Definitions"). Our recommendations include: providing more information on potential impacts from the unlined burial pit and open air burning options in the preferred alternative; clarifying how the 50 ton weight threshold for a mass animal health emergency was determined; and expanding the climate change analysis to include increased frequency and intensity of weather events. Please also see the attached EPA Detailed Comments.

EPA appreciates the opportunity to review this draft PEIS. Please feel free to contact me or have your staff contact Karin Leff, Acting Director, NEPA Compliance Division, at (202)564-7168 if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Karin Leff". The signature is written in a cursive, flowing style.

Susan E. Bromm
Director
Office of Federal Activities

Enclosures: Summary of EPA Rating Definitions
EPA's Detailed Comments